# **ELLIS: LAWHORNE**

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July 19, 2012

## FILED ELECTRONICALLY

The Honorable Jocelyn G. Boyd Chief Clerk **South Carolina Public Service Commission** PO Drawer 11649 Columbia SC 29211

RE:

Application of Ready Set Movers, LLC to Amend Class E (Household

Goods) Certificate of Public Convenience and Necessity

Certificate No. 9787, **Docket No. 2011-53-T, ELS File 2487-11750** 

### Dear Jocelyn:

On behalf of Ready Set Movers, LLC ("Applicant"), and pursuant to Commission Rule 103-834, I request that the Commission grant Applicant leave to take the deposition of a witness chosen by the Applicant at a time and place to be agreed upon by the parties in the above-referenced Docket. Any such witness(es) will testify as the Applicant's shipper witness(es), and do so via deposition and in lieu of an appearance at the hearing in this case. Allowing testimony via deposition will accommodate the schedule of any such witness. I have spoken to counsel for the South Carolina Office of Regulatory Staff ("ORS") regarding this request, and the ORS does not object.

The facts that Applicant seeks to establish by deposition are those that support Applicant's application in this Docket: that there is statewide demand for household goods moving services that is not currently being met.

The deposition(s) will take place at a time mutually agreed upon by the parties, via telephone or otherwise, at the offices of Ellis, Lawhorne & Sims, P.A., 1501 Main Street, 5<sup>th</sup> Floor, Columbia, South Carolina 29201.

With kind regards, I am

Yours truly,

s/ John J. Pringle, Jr. John J. Pringle, Jr.

cc:

Jeffrey M. Nelson, Esquire

Mr. Caleb Roca

#### **BEFORE**

#### THE PUBLIC SERVICE COMMISSION OF

#### **SOUTH CAROLINA**

#### **DOCKET NO. 2011-53-T**

IN RE:	Application of Ready Set Movers, LLC to	)	
	Amend Class E (Household Goods)	)	CERTIFICATE OF
	Certificate of Public Convenience and	)	<b>SERVICE</b>
	Necessity	)	
	Certificate Number 9787	)	

This is to certify that I have caused to be served this day, one (1) copy of the **Request for Leave to Take Deposition** by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

## **VIA ELECTRONIC MAIL SERVICE**

Jeffrey Nelson, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia SC 29201

s/ Carol RoofCarol RoofParalegal

July 19, 2012 Columbia, South Carolina